CBER Update on Risk-Based Initiatives for Regulated Products

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James S. Cohen, J.D.

Acting Director, Office of Compliance and Biologics Quality
Center for Biologics Evaluation and Research
Food and Drug Administration

CBER Update on Risk-Based Initiatives for Regulated Products

- CBER's Efficient Risk Management
- FDA Critical Path Initiative
- Risk-Based Compliance Initiatives
- Counterterrorism
- Counterfeiting

CBER's Efficient Risk Management

- Enhanced review management and processes
  - Review template initiative
    - Enhance consistency, quality of review and submission and facilitate electronic processes
  - Review of Review Initiative
    - Identify best practices/management and prepare for implementation of Agency-wide quality initiatives

CBER's Efficient Risk Management
continued

- Pharmaceutical CGMPs for the 21st Century
  - CBER previously adopted many practices that serve to inform the process
    - Product experts on inspections, specialized teams and training, risk-based prioritization, Center review of Warning Letters
    - Additional Center Initiative: enhance inspectional and compliance integration/coordination with product review process

FDA Critical Path Initiative

- Facilitate product development through better tools and latest technologies for product manufacturing, and for ensuring safety and efficacy
- Focus intramural and extramural science as resources permit
  - Identifying areas, especially new technologies, where needed standards, methods, assays, guidance can be helpful

FDA Critical Path Initiative
continued

- Focus intramural and extramural science as resources permit (continued)
  - Assure internal expertise, appropriate partnerships with industry, academic/scientific community and consumers
  - Identify the gaps, scientific and regulatory, and develop appropriate solutions
    - Current focus on CBER science

CBER Science and FDA Critical Path Initiative

- Generally targets unmet needs with regulatory implications to facilitate the development of products
  - Benefits multiple sponsors; high impact for new fields, products with uncertain markets, public health
- Maintains staff "cutting edge" expertise needed for dealing with evolving biotechnologies
  - Scientific expertise and confidence foster objectivity
    - Reduce risks or reflexive over- and under-protectiveness
    - Make regulation more scientific, less "defensive"

CBER Science and FDA Critical Path Initiative

continued

- CBER to hold public workshop with stakeholders in October ‘04 to provide forum for discussing development of innovative scientific knowledge and tools to expand availability of new biological products

Risk-Based Compliance Initiatives

- Systems-based inspections
- Further development of CBER's risk-based compliance strategy
- Team Biologics Update

Systems-Based Inspections

- Compliance Program Guide: 7342.001 - "Inspection of Licensed and Unlicensed Blood Banks, Brokers, Reference Laboratories, and Contractors
  - Issued July 1, 2003
  - Implemented September 1, 2003
  - http://www.fda.gov/cber/cpg/cpg.htm

Systems-Based Inspections
continued

- Additional CBER initiatives
  - Systems-based Source Plasma Compliance Program Guide – anticipate completion during Fall ‘04
  - Systems-based Biological Drug Compliance Program Guide – anticipate completion during Fall ‘04
  - Future tissue compliance program update following implementation of tissue program final rules

Elements of Systems-Based Inspections

- Risk management
- Focus on critical systems
- Where applicable, provides method to determine level of inspectional coverage and resources appropriate for each inspection

Why Systems-Based Inspections?

- Ties in with Agency's risk-based initiative
- Commissioner's Strategic Plan
  - Efficient risk management
  - Improving healthcare through better information
  - Improving patient and consumer safety
  - Protecting America from terrorism
  - Smarter regulation through a stronger workforce
- Pharmaceutical CGMPs for the 21st Century: A Risk-Based Approach

Why Systems-Based Inspections?
continued

- More focused inspections
  - Identify and train investigators on:
    - Critical systems
    - Critical issues within the systems
    - Specific technical training

Why Systems-Based Inspections?
continued

- Best Use of Resources
  - Reduce inspection length
  - Use resources to conduct appropriately focused inspections, develop guidance, etc.
  - Optimize level of effort necessary to determine compliance

CBER Compliance Plans

- CBER is reviewing the lot release process from a risk-management viewpoint
  - Review of current testing matrix
  - Compare to other regulatory agency models
  - Pilot program for plasma derivatives to implement PDUFA-like timeframes

CBER Compliance Plans
continued

- Improvements to the review process
  - Developing review templates for greater standardization
  - Reviewing current guidance for changes to be reported using a risk-based approach
  - Develop additional procedures and practices
  - Improve coordination and communication between Offices

Team Biologics Update

- Seventh anniversary
- Ongoing efforts focused on
  - Consistency
  - Inspection timeframes
  - Investigator and Product Specialist training

What's Next for Team Biologics?

- We are now completing our in-depth evaluation to build on and improve process
  - Revised Charter
  - Adopt internal quality management system
  - Develop metrics to determine impact on industry/measure success
  - Standardize training and qualifications of Core Team members
  - Risk-based work planning
  - Increased communications and improved coordination between headquarters and field
  - Further integration of product specialists into program

Relationship of Team Biologics to CGMP Initiative

- Measuring success
- Quality definition
- Training of investigators
- Consistency of application of regulations
- Center review of proposed Warning Letters
  - In addition to current Office of Chief Counsel review
  - Similar to CBER existing practice

Team Biologics

Conclusions

- Team Biologics continues to evolve
- Committed to continuing improvement
- CGMP Initiative should have positive impact on efforts
- Industry can play active role

Counterterrorism

- Now ~ 25% of CBER effort/resource use
- Proactive needs/gap assessments/ inventories
- Emergency availability of critical countermeasures for smallpox, botulinum and anthrax threats (vaccines/blood/ immunoglobulins)

Counterterrorism
continued

- Critical participation in multiple Task Forces for and outreach regarding product development, including industry, CDC, NIH, and DOD
- Proactive site visits/manufacturers' assistance
- Proactive communication and guidance on facility, manufacturing, and product development challenges

Counterterrorism
continued

- CBER Initiatives
  - CT Coordinating Committee
  - Bioshield-related guidance and evaluation
  - New technologies
  - CT Product Safety Planning
    - Define measures to reduce potential vulnerabilities of CBER biologic products essential to the response to terrorist events

Counterfeiting

- Substantial increase in counterfeiting nationally and internationally in recent years
- FDA's Counterfeit Drug Initiative
  - Announced July 16, 2003
  - Interim report issued October 2, 2003
  - Final report issued February 18, 2004

FDA's Counterfeit Drug Initiative

Final Report

- Pharmaceutical industry should adopt secure business practices
- States should adopt and enforce stronger anti-counterfeiting requirements
- New technologies should be employed
  - Radiofrequency identification technology (RFID)
  - Authentication technologies

FDA's Counterfeit Drug Initiative

Final Report - continued

- Electronic pedigree (RFID) should accomplish and surpass goals of Prescription Drug Marketing Act
  - FDA intends to focus on tracing movement of drugs
- Congress should increase criminal penalties and strengthen FDA's authority

FDA's Counterfeit Drug Initiative

Final Report - continued

- FDA intends to develop effective reporting and rapid response systems, including dissemination of information to public
- CBER has fully implemented procedures for responding to and addressing reports of potential counterfeiting events

Information and Contacts

- www.fda.gov/cber
- Email CBER
  - Manufacturers
    - matt@cber.fda.gov
  - Consumers, health care professionals
    - octma@cber.fda.gov
- 1-800-835-4709